

No. 20-7622  
IN THE  
*Supreme Court of the United States*

MERLE DENEZPI,  
*Petitioner,*

v.

UNITED STATES,  
*Respondent.*

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the document contains 7,977 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 18, 2022.

/s/ Ian Heath Gershengorn  
Ian Heath Gershengorn